

**STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION**

TIME SCHEDULE ORDER NO. R4-2018-YYYY

**REQUIRING THE LOS ANGELES TURF CLUB, INC.
(SANTA ANITA PARK)
TO COMPLY WITH REQUIREMENTS PRESCRIBED IN
ORDER NO. R4-2018-XXXX
(NPDES PERMIT NO. CA0064203)**

The California Regional Water Quality Control Board, Los Angeles Region, (hereinafter, Regional Water Board) finds:

1. Santa Anita Land Holdings, LLC owns the Los Angeles Turf Club, Inc. (together hereinafter Discharger) and operates the Santa Anita Park (hereinafter Facility or SAP), a 127 acre horse stabling, training, and racing facility located at 285 West Huntington Drive, Arcadia, CA. The SAP includes both Concentrated Animal Feeding Operations (CAFO) and non-CAFO areas. The non-CAFO areas include the racetrack, infield, grandstand, maintenance yard, and paddock gardens (small circular viewing areas where jockeys mount horses prior to a race). Both the CAFO and the non-CAFO areas are regulated under the National Pollutant Discharge Elimination System (NPDES) permit, Regional Water Board Order No. R4-2018-XXXX, (NPDES Permit No. CA0064203) (hereafter, the "Permit").
2. The CAFO area is approximately 46 acres. The CAFO area houses up to 2,000 horses in 80 stables at different times of the year and it includes manure management areas. SAP is also classified as a large CAFO because it confines more than 500 horses for 45 days or more in a 12-month period. Further, the facility is also a confined animal facility (CAF) pursuant to California Code of Regulations, Title 27, section 20164 because the stables confine horses that do not graze. The Facility discharges storm water from Non-CAFO and CAFO areas to Arcadia Wash, a water of the United States, and is currently regulated by Order R4-2006-0081 which was adopted on November 9, 2006. The Discharger has submitted a number of plans for modifications of the CAFO area. A final revised ROWD was submitted on January 19, 2018, with new facility modification plans that are scheduled to be implemented within the next 10 years.
3. In the CAFO areas, the first 0.1-inch of storm water is diverted to the sanitary sewer system via a small pump. A larger pump conveys storm water in excess of the 0.1-inch to two holding tanks in the stables area. Storm water runoff in excess of the two holding tanks' capacity (44,000 gallons total) overflows to the Arcadia Wash through Discharge Points 014 and 015 at the North and South Diversion Structures. Water in the holding tanks is then manually discharged through a 2-inch discharge pipe back to the South Lift Station and discharged to the sanitary sewer 24 hours after the end of the rain event.

In non-CAFO areas, all wet weather flows discharge directly to the Arcadia Wash through Discharge Points 001, 002-003, 004, 005-006, 007, 008, 009, 010, 011, 012, and 013, with the exception of the flow through Discharge Point 004. The first 0.02-inches of storm water runoff from Discharge Point 004 is pumped to the North Diversion Structure, where it is pumped to the sanitary sewer system.

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4. Dry weather process wastewater discharges have been eliminated. CAFO horse wash areas, vehicle wash areas, and fountains from non-CAFO areas are all connected to the sanitary sewer. The stable portions of Santa Anita are subject to the regulatory requirements for CAFOs, pursuant to title 40 Code of Federal Regulations section 122.23 (NPDES Permit Regulations) Part 412, Subpart A—Horses and Sheep, (Effluent Limitation Guidelines [ELGs] and Standards for CAFO).
5. The Facility was previously regulated under Order No. R4-2006-0081 which did not include effluent limitations. Data submitted to the Regional Board by the Discharger from 2006 to 2017 was used to determine if the discharge may cause or have a reasonable potential to cause or contribute to an excursion above any applicable priority pollutant criteria or water quality objective (reasonable potential).
6. Order No. R4-2018-XXXX prescribed effluent limitations (both concentration and mass based) for pollutants through Discharge Points 001 through 015. The effluent limitations for pollutants with detected concentrations that exceed the final effluent limitations are:

Table 1: Final Effluent Limitations from Discharge Points 001, 002-003, 004, 005-006, 007, 008, 009, 010, 011, 012, 013, 014, 015 (Order R4-2018-XXXX)

Parameter	Discharge Points	Units	Effluent Limitation	
			Maximum Daily	Rationale
Total Suspended Solids (TSS)	All	mg/L	75	BPJ
	001	lbs/day	832	
	002-003	lbs/day	69	
	004	lbs/day	532	
	005-006	lbs/day	38	
	007	lbs/day	44	
	008	lbs/day	13	
	009	lbs/day	44	
	010	lbs/day	219	
	011	lbs/day	56	
	012	lbs/day	250	
	013	lbs/day	1945	
	014	lbs/day	788	
	015	lbs/day	1827	
BOD ₅	All	mg/L	30	BPJ
	001	lbs/day	323	
	002-003	lbs/day	28	
	004	lbs/day	213	
	005-006	lbs/day	15	
	007	lbs/day	18	
	008	lbs/day	5	

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Parameter	Discharge Points	Units	Effluent Limitation	
			Maximum Daily	Rationale
BOD ₅	009	lbs/day	18	BPJ
	010	lbs/day	88	
	011	lbs/day	23	
	012	lbs/day	100	
	013	lbs/day	778	
	014	lbs/day	315	
	015	lbs/day	731	
Ammonia as Nitrogen	All	mg/L	8.7	TMDL
	001	lbs/day	97	
	002-003	lbs/day	8	
	004	lbs/day	62	
	005-006	lbs/day	4	
	007	lbs/day	5	
	008	lbs/day	1	
	009	lbs/day	5	
	010	lbs/day	25	
	011	lbs/day	7	
	012	lbs/day	29	
	013	lbs/day	226	
	014	lbs/day	92	
	015	lbs/day	212	
Settleable Solids	All	ml/L	0.3	BPJ
Antimony	004, 012	µg/L	6	CTR
	004	lbs/day	0.04	
	012	lbs/day	0.02	
Arsenic	001, 002-003, 004, 005-006, 007, 008, 009, 013, 014, 015	µg/L	10	CTR
	001	lbs/day	0.1	
	002-003	lbs/day	0.009	
	004	lbs/day	0.07	
	005-006	lbs/day	0.005	
	007	lbs/day	0.006	
	008	lbs/day	0.002	
	009	lbs/day	0.006	
013	lbs/day	0.3		

T E N T A T I V E

Parameter	Discharge Points	Units	Effluent Limitation	
			Maximum Daily	Rationale
Arsenic	014	lbs/day	0.1	CTR
	015	lbs/day	0.2	
Beryllium	004, 007, 013	µg/L	4	CTR
	004	lbs/day	0.03	
	007	lbs/day	0.002	
	013	lbs/day	0.1	
Cadmium, Total Recoverable (Wet Weather)	All	µg/L	3.1	TMDL
	001	lbs/day	0.03	
	002-003	lbs/day	0.003	
	004	lbs/day	0.02	
	005-006	lbs/day	0.002	
	007	lbs/day	0.002	
	008	lbs/day	0.0005	
	009	lbs/day	0.002	
	010	lbs/day	0.01	
Cadmium, Total Recoverable (Wet Weather)	012	lbs/day	0.01	TMDL
	013	lbs/day	0.08	
	014	lbs/day	0.03	
	015	lbs/day	0.08	
Cadmium, Total Recoverable (Dry Weather based on CTR criteria)	002-003, 004, 005-006, 007, 010, 013, 014, 015	µg/L	2.5	CTR
	002-003	lbs/day	0.002	
	004	lbs/day	0.02	
	005-006	lbs/day	0.001	
	007	lbs/day	0.001	
	010	lbs/day	0.007	
	013	lbs/day	0.06	
	014	lbs/day	0.03	
015	lbs/day	0.06		
Chromium III, Total Recoverable	002-003, 004, 005-006, 007, 013, 014, 015	µg/L	224	CTR
	002-003	lbs/day	0.2	
	004	lbs/day	1.6	
	005-006	lbs/day	0.1	
	007	lbs/day	0.1	
	013	lbs/day	5.8	

T E N T A T I V E

Parameter	Discharge Points	Units	Effluent Limitation	
			Maximum Daily	Rationale
Chromium III, Total Recoverable	014	lbs/day	2.2	CTR
	015	lbs/day	5.5	
Chromium VI, Total Recoverable	001, 002-003, 004, 005-006, 007, 013, 014, 015	µg/L	16.3	CTR
	001	lbs/day	0.2	
	002-003	lbs/day	0.02	
	004	lbs/day	0.1	
	005-006	lbs/day	0.008	
	007	lbs/day	0.01	
	013	lbs/day	0.4	
	014	lbs/day	0.2	
Copper, Total Recoverable (Wet Weather)	All	µg/L	67.5	TMDL
	001	lbs/day	0.7	
	002 - 003	lbs/day	0.06	
	004	lbs/day	0.5	
	005 - 006	lbs/day	0.03	
	007	lbs/day	0.04	
	008	lbs/day	0.01	
	009	lbs/day	0.04	
	010	lbs/day	0.2	
	011	lbs/day	0.05	
	012	lbs/day	0.2	
	013	lbs/day	1.7	
	014	lbs/day	0.7	
	015	lbs/day	1.6	
Copper, Total Recoverable (Dry Weather based on CTR criteria)	All	µg/L	8.7	CTR
	001	lbs/day	0.1	
	002 - 003	lbs/day	0.01	
	004	lbs/day	0.06	
	005 - 006	lbs/day	0.004	
	007	lbs/day	0.005	
	008	lbs/day	0.001	

T E N T A T I V E

Parameter	Discharge Points	Units	Effluent Limitation	
			Maximum Daily	Rationale
Copper, Total Recoverable (Dry Weather based on CTR criteria)	009	lbs/day	0.005	CTR
	010	lbs/day	0.03	
	011	lbs/day	0.007	
	012	lbs/day	0.03	
	013	lbs/day	0.2	
	014	lbs/day	0.1	
	015	lbs/day	0.2	
Cyanide	005-006, 008	µg/L	8.5	CTR
	005-006	lbs/day	0.004	
	008	lbs/day	0.001	
Lead, Total Recoverable (Wet Weather)	All	µg/L	62	TMDL
	001	lbs/day	0.7	
	002-003	lbs/day	0.06	
	004	lbs/day	0.4	
	005-006	lbs/day	0.03	
Lead, Total Recoverable (Wet Weather)	007	lbs/day	0.04	TMDL
	008	lbs/day	0.01	
	009	lbs/day	0.04	
	010	lbs/day	0.2	
	011	lbs/day	0.05	
	012	lbs/day	0.2	
	013	lbs/day	1.6	
	014	lbs/day	0.7	
Lead, Total Recoverable (Dry Weather based on CTR criteria)	All	µg/L	2.7	CTR
	001	lbs/day	0.03	
	002 - 003	lbs/day	0.003	
	004	lbs/day	0.02	
	005 - 006	lbs/day	0.001	
	007	lbs/day	0.001	
	008	lbs/day	0.0004	
	009	lbs/day	0.001	
	010	lbs/day	0.006	
	011	lbs/day	0.002	
	012	lbs/day	0.006	
	013	lbs/day	0.07	
	014	lbs/day	0.03	

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Parameter	Discharge Points	Units	Effluent Limitation	
			Maximum Daily	Rationale
Lead, Total Recoverable (Dry Weather based on CTR criteria)	015	lbs/day	0.06	CTR
Mercury, Total Recoverable	001, 002-003, 004, 005-006, 007, 009, 010, 011, 012, 013, 014, 015	µg/L	0.1	CTR
	001	lbs/day	0.001	
	002-003	lbs/day	0.0001	
	004	lbs/day	0.0007	
	005-006	lbs/day	0.00005	
	007	lbs/day	0.00006	
	009	lbs/day	0.00006	
	010	lbs/day	0.0004	
	011	lbs/day	0.00008	
	012	lbs/day	0.0003	
	013	lbs/day	0.003	
014	lbs/day	0.001		
Mercury, Total Recoverable	015	lbs/day	0.003	CTR
Nickel, Total Recoverable	002-003, 004, 005-006, 007, 009, 013, 014, 015	µg/L	56	CTR
	002-003	lbs/day	0.05	
	004	lbs/day	0.4	
	005-006	lbs/day	0.03	
	007	lbs/day	0.03	
	009	lbs/day	0.03	
	013	lbs/day	1.5	
	014	lbs/day	0.6	
015	lbs/day	1.4		
Selenium, Total Recoverable	002-003, 004, 005-006, 007, 011, 012, 013, 014	µg/L	8.2	CTR
	002-003	lbs/day	0.008	
	004	lbs/day	0.06	
	005-006	lbs/day	0.004	
	007	lbs/day	0.005	
	011	lbs/day	0.006	

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Parameter	Discharge Points	Units	Effluent Limitation	
			Maximum Daily	Rationale
Selenium, Total Recoverable	012	lbs/day	0.03	CTR
	013	lbs/day	0.2	
	014	lbs/day	0.09	
Silver, Total Recoverable	004, 005-006, 007, 014	µg/L	1.7	CTR
	004	lbs/day	0.009	
	005-006	lbs/day	0.0009	
	007	lbs/day	0.0009	
	014	lbs/day	0.02	
Thallium	005-006, 007, 011, 012, 015	µg/L	2	CTR
	005-006	lbs/day	0.001	
	007	lbs/day	0.001	
	011	lbs/day	0.002	
	012	lbs/day	0.006	
	015	lbs/day	0.05	
Zinc, Total Recoverable (Wet Weather)	All	µg/L	159	TMDL
	001	lbs/day	1.8	
	002 - 003	lbs/day	0.2	
	004	lbs/day	1.1	TMDL
	005 - 006	lbs/day	0.08	
	007	lbs/day	0.09	
	008	lbs/day	0.03	
	009	lbs/day	0.09	
	010	lbs/day	0.6	
	011	lbs/day	0.1	
	012	lbs/day	0.5	
	013	lbs/day	4.1	
	014	lbs/day	1.7	
	015	lbs/day	3.9	
	Zinc, Total Recoverable (Dry Weather based on CTR criteria)	All	µg/L	
001		lbs/day	0.9	
002 - 003		lbs/day	0.07	
004		lbs/day	0.6	
005 - 006		lbs/day	0.04	
007		lbs/day	0.05	
008		lbs/day	0.01	
009		lbs/day	0.05	
010		lbs/day	0.3	
011	lbs/day	0.06		

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Parameter	Discharge Points	Units	Effluent Limitation	
			Maximum Daily	Rationale
Zinc, Total Recoverable (Dry Weather based on CTR criteria)	012	lbs/day	0.3	CTR
	013	lbs/day	2	
	014	lbs/day	0.8	
	015	lbs/day	1.9	
Bis(2-ethylhexyl)phthalate	001, 004, 005-006, 007, 009, 011, 012, 013, 014, 015	µg/L	4	CTR
	001	lbs/day	0.03	
	004	lbs/day	0.03	
	005-006	lbs/day	0.002	
	007	lbs/day	0.002	
	009	lbs/day	0.002	
	011	lbs/day	0.003	
	012	lbs/day	0.01	
	013	lbs/day	0.1	
	014	lbs/day	0.03	
Fecal Coliform	All	MPN/100 ml	¹	BP
E. coli	All	CFU/100 ml or MPN/100 ml	²	TMDL

¹ The single sample fecal coliform concentration shall not exceed 400/100ml and the geometric mean limit shall not exceed 200/100ml. The geometric mean values should be calculated based on a statistically sufficient number of samples (generally not less than 5 samples equally spaced over a 30-day period).

² The single sample E. coli concentration shall not exceed 235/100ml and the geometric mean limit shall not exceed 126/100ml. The geometric mean values should be calculated based on a statistically sufficient number of samples (generally not less than 5 samples equally spaced over a 30-day period).

- On September 13, 2016, and March 10, 2017, the Discharger submitted letters requesting a time schedule order (TSO) with a proposed work plan and interim effluent limitations for TSS, BOD, fecal coliform, cadmium, chromium III, chromium VI, copper, cyanide, lead, mercury, nickel, selenium, silver, thallium, zinc, and bis(2-ethylhexyl)phthalate. Revisions were made to the TSO request, to provide additional detail regarding the work plan, and submitted to the Regional Water Board on January 19, 2018¹, and subsequently on April 20, 2018, to include a request for interim effluent limitations for ammonia and settleable solids. The TSO allows the Discharger the time required to study the sources and causes of exceedances of pollutant effluent limitations and install, if necessary, the appropriate treatment system.

¹ There was a typographical error. The front page was wrongly dated as January 19, 2017.

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8. The maximum effluent concentration (MEC) from the monitoring data collected was compared to the effluent limitations included in Order R4-2018-XXXX. The results are presented below in Table 2:

Table 2: Maximum Effluent Concentration Range and Proposed Effluent Limitations – Outfalls 001 through 015

Parameter	Outfall	Units	Maximum Effluent Concentration Range	Maximum Daily Effluent Limitations
TSS	All	mg/L	1,596 – 41,800	75
BOD ₅	All	mg/L	141 - 645	30
Ammonia as Nitrogen	All	mg/L	0.57 - 1010	8.7
Settleable Solids	All	ml/L	0.2 - 250	0.3
Fecal Coliform	All	MPN/100ml	800 – 500,000	400
E. coli	All	CFU/100 ml or MPN/100 ml	1	235
Antimony	004, 012	µg/L	55 - 470	6
Arsenic	001, 002-003, 004, 005-006, 007, 008, 009, 013, 014, 015	µg/L	12 - 83	10
Beryllium	004, 007, 013	µg/L	8 - 14	4
Chromium III, Total Recoverable	002-003, 004, 005-006, 007, 013, 014, 015	µg/L	295 - 1020	224
Chromium VI, Total Recoverable	001, 002-003, 004, 005-006, 007, 013, 014, 015	µg/L	45.8 - 878	16.3
Copper, Total Recoverable (Wet Weather)	All	µg/L	85 - 543	67.5

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Parameter	Outfall	Units	Maximum Effluent Concentration Range	Maximum Daily Effluent Limitations
Lead, Total Recoverable (Wet Weather)	All	µg/L	65 - 200	62
Mercury, Total Recoverable	001, 002-003, 004, 005-006, 007, 009, 010, 011, 012, 013, 014, 015	µg/L	0.16 – 0.68	0.1
Nickel, Total Recoverable	002-003, 004, 005-006, 007, 009, 013, 014, 015	µg/L	113 - 281	56
Selenium, Total Recoverable	002-003, 004, 005-006, 007, 011, 012, 013, 014	µg/L	9 - 39	8.2
Silver, Total Recoverable	004, 005-006, 007, 014	µg/L	4 - 7	1.7
Thallium	005-006, 007, 011, 012, 015	µg/L	4 - 10	2
Zinc, Total Recoverable (Wet Weather)	All	µg/L	440 - 5100	159
Bis(2-ethylhexy) phthalate	001, 004, 005-006, 007, 009, 011, 012, 013, 014, 015	µg/L	6.5 - 18	4

¹ The Discharger was not required to monitor E. coli in Order No. R4-2006-0081. Therefore, no historical monitoring data is available.

- Based on monitoring data submitted by the Discharger for the period of 2006 to 2017, the Regional Water Board finds that the discharge to the Arcadia Wash through Discharge Points 001 through 015 would not comply with the new effluent limitations contained in Order No. R4-2018-XXXX for TSS, BOD, ammonia, settleable solids, fecal coliform, antimony, arsenic, beryllium, cadmium, chromium III, chromium VI, copper, cyanide, lead, mercury, nickel, selenium, silver, thallium, zinc, and bis(2-ethylhexyl)phthalate. Accordingly, pursuant to CWC

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section 13300, a discharge of waste is taking place and/or threatens to take place that will violate requirements prescribed by the Regional Water Board.

10. Section 13300 of the Water Code states, in part, that:

“Whenever a regional board finds that a discharge of waste is taking place or threatening to take place that violates or will violate requirements prescribed by the regional board, or the state board, or that the waste collection, treatment, or disposal facilities of a discharger are approaching capacity, the board may require the discharger to submit for approval of the board, with such modifications as it may deem necessary, a detailed time schedule of specific actions the discharger shall take in order to correct or prevent a violation of requirements.”

11. The Regional Water Board evaluated the request for interim limitations and determined that the discharge from the Facility cannot consistently meet new effluent limitations contained in Order No. R4-2018-XXXX for TSS, BOD, ammonia, settleable solids, fecal coliform, e. coli, antimony, arsenic, beryllium, cadmium, chromium III, chromium VI, copper, cyanide, lead, mercury, nickel, selenium, silver, thallium, zinc, and bis(2-ethylhexyl)phthalate for the discharge of storm water to Arcadia Wash through Discharge Points 001 through 015. The Regional Water Board finds that interim limitations for these constituents are appropriate.

12. The Discharger has indicated that facility modifications will be required to comply with the final effluent limitations included in Order R4-2018-XXXX. The Discharger will be required to make facility changes such that the production waste and storm water runoff from the 25-year 24-hour storm event for all horse production areas can be retained on site and/or discharged to sanitary sewer. The storm water runoff collected from the roof will be treated using a BioKlean membrane filter (for removal of TSS, metals, nutrients, and hydrocarbons) and will then be discharged to Arcadia Wash.

13. Water Code section 13385, subdivisions (h) and (i), require the Regional Water Board to impose mandatory minimum penalties upon dischargers that violate certain effluent limitations. Section 13385(j)(3) exempts violations of an effluent limitation from mandatory minimum penalties "where the waste discharge is in compliance with either a cease and desist order issued pursuant to Section 13301 or a time schedule order issued pursuant to Section 13300 ..., *if all of the ... [specified] requirements are met.*" (emphasis added).

14. As described in Findings 7 through 12, *supra*, and pursuant to Water Code section 13385, subdivision (j)(3)(A)-(D), the Regional Water Board finds that a TSO should issue because:

- a. This TSO is issued on or after July 1, 2000 and specifies the actions that the Discharger is required to take in order to correct the violations that would otherwise be subject to Water Code section 13385, subdivisions (h) and (i).
- b. The Discharger is not able to consistently comply with the effluent limitations established in the Permit, because the effluent limitations are new or more stringent requirements that have become applicable to the waste discharge after the effective date of the waste

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discharge requirements and after July 1, 2000. New or modified control measures are necessary in order for the Discharger to comply with the new effluent limitations for TSS, BOD, ammonia, settleable solids, fecal coliform, chromium III, chromium VI, copper, lead, mercury, nickel, zinc, and bis(2-ethylhexyl)phthalate, prescribed in Order No. R4-2018-XXXX. New control measures cannot be designed, installed, and put into operation within 30 calendar days.

- c. This TSO establishes interim effluent limitations for TSS, BOD, ammonia, settleable solids, fecal coliform, e. coli, antimony, arsenic, beryllium, cadmium, chromium III, chromium VI, copper, cyanide, lead, mercury, nickel, selenium, silver, thallium, zinc, and bis(2-ethylhexyl)phthalate, and requires the Discharger to undertake specific actions in order to prevent the discharge of waste that exceeds or threatens to exceed the final effluent limitations for these pollutants prescribed in Order No. R4-2018-XXXX. The TSO establishes a time schedule for bringing the waste discharge into compliance with the final effluent limitations that is as short as possible, taking into account the technological, operational, and economic factors that affect the design, development, and implementation of the control measures that are necessary for compliance.
 - d. The TSO does not exceed five years in length.
15. The Discharger proposes to implement CAFO improvements to comply with the CAFO storm water regulations for the existing stable area. The regulation requires the retention of the 25-year storm event for all horse production areas within the Santa Anita Park. Production areas include the existing stable area where horses are permanently sheltered and all dirt pathways, walkways, hot walkers and all other exposed surfaces within the stable area not covered by roofs.

In order to effectively collect, store and prohibit storm water discharges from the stable area entering the Arcadia Wash up to the 25-year, 24-hour storm event, three (3) major steps are planned.

Step 1: Isolated Roof Drain System

A separate dedicated storm drain system will be implemented to collect all rooftop runoff up to the 25-year, 24-hour storm event within the stable area. Upon completion of the roof drain system, it will result in two discharge points to the Arcadia Wash.

Step 2: CAFO Basin

A portion of the Owner's Parking Lot will be converted into a CAFO Basin. The CAFO Basin will discharge to the sewer at a controlled rate which will be monitored by a dedicated flow meter. The CAFO Basin will be designed as a depressed storage basin with a capacity of 3.0 ac-ft to accommodate the 25-year, 24-hour storm event for the stable area (dirt surfaces only) and the hay waste transfer area directly adjacent to the stables.

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Step 3: Sewer Diversion System Modifications and Water Line Relocations

After the implementation of the roof drain system and CAFO basin, modifications to the existing storm drain/sewer diversion system will be required. Under the proposed conditions, all flows collected by the sewer diversion system will discharge into the proposed CAFO basin via gravity flows. A new lift station will be incorporated to transfer runoff from the CAFO basin to the sanitary sewer system.

16. The time schedule for completion of all of the actions necessary to bring the waste discharge into compliance with the terms of the Permit exceeds one year from the effective date of this TSO. Accordingly, this TSO includes interim requirements and dates for their achievement. The interim requirements include interim effluent limitations and actions and milestones leading to compliance with the final effluent limitations set by Order No. R4-2018-XXXX by June 30, 2023.
17. Full compliance with the requirements of this TSO exempts the Discharger from mandatory minimum penalties only for violations of the final effluent limitations of storm water flow from CAFO and non-CAFO areas for TSS, BOD, ammonia, settleable solids, fecal coliform, e. coli, antimony, arsenic, beryllium, cadmium, chromium III, chromium VI, copper, cyanide, lead, mercury, nickel, selenium, silver, thallium, zinc, and bis(2-ethylhexyl)phthalate, in Order No. R4-2018-XXXX, pursuant to Water Code section 13385(j)(3).
18. Water Code section 13385(j)(3) requires the Discharger to prepare and implement a pollution prevention plan pursuant to Water Code section 13263.3.
19. This TSO allows the Discharger time to evaluate and, if needed undertake actions to reduce the amount of TSS, BOD, ammonia, settleable solids, fecal coliform, antimony, arsenic, beryllium, cadmium, chromium III, chromium VI, copper, cyanide, lead, mercury, nickel, selenium, silver, thallium, zinc, and bis(2-ethylhexyl)phthalate in its waste discharge and comply with applicable effluent limitations. This Order does not modify the final effluent limitations for these pollutants set by Order No. R4-2018-XXXX. The interim effluent limitations with the compliance schedule included in this TSO will advance completion of necessary upgrades to control measures to reduce the pollutant concentrations in the waste discharge in a timely manner, and are therefore in the public interest.
20. The Regional Water Board has notified the Discharger, interested agencies, and persons of its intent to issue this TSO concerning compliance with waste discharge requirements. The Regional Water Board accepted written comments, and heard and considered all comments pertinent to this matter in a public hearing.
21. Issuance of this TSO is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000 et seq.) in accordance with section 15321(a), Title 14 of the California Code of Regulations (exemption from CEQA for enforcement

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actions) and section 15301, Title 14 of the California Code of Regulations (exemption from CEQA for existing facilities).

22. Any person aggrieved by this action of the Regional Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must *receive* the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

IT IS HEREBY ORDERED that, pursuant to Water Code section 13300, the Los Angeles Turf Club, Inc., as the owner and operator of the Santa Anita Park, shall comply with the requirements listed below to ensure compliance with the final effluent limitations contained in Order No. R4-2018-XXXX:

1. Comply August 1, 2018, with the following interim effluent limitations:

Table 3. Interim Effluent Limitations for Santa Anita Park from Discharge Points 001 through 015

Parameter	Discharge Points	Units	Interim Effluent Limitation ¹
			Maximum Daily
TSS	All	mg/L	9155 ²
	001	lbs/day	101,504
TSS	002-003	lbs/day	8,418
	004	lbs/day	64,904
	005-006	lbs/day	4,636
	007	lbs/day	5,368
	008	lbs/day	1,586
	009	lbs/day	5,368
	010	lbs/day	26,718
	011	lbs/day	6,832
	012	lbs/day	30,500
	013	lbs/day	237,290
	014	lbs/day	96,136
	015	lbs/day	222,894
BOD ₅	All	mg/L	645 ³
	001	lbs/day	6,945
	002-003	lbs/day	602
	004	lbs/day	4,580

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Parameter	Discharge Points	Units	Interim Effluent Limitation ¹
			Maximum Daily
BOD ₅	005-006	lbs/day	323
	007	lbs/day	387
	008	lbs/day	108
	009	lbs/day	387
	010	lbs/day	1,892
	011	lbs/day	495
	012	lbs/day	2,150
	013	lbs/day	16,727
	014	lbs/day	6,773
	015	lbs/day	15,717
Fecal coliform	All	MPN/100	36,813 ⁴
E. Coli	All	MPN/100	1175 ⁵
Ammonia as Nitrogen	All	mg/L	440 ⁶
	001	lbs/day	4.9
	002-003	lbs/day	0.4
	004	lbs/day	3.1
	005-006	lbs/day	0.2
	007	lbs/day	0.3
	008	lbs/day	0.07
	009	lbs/day	0.3
	010	lbs/day	1.3
	011	lbs/day	0.3
	012	lbs/day	1.5
	013	lbs/day	11.4
	014	lbs/day	4.6
	015	lbs/day	10.7
Settleable Solids	All	ml/L	26 ⁷
Antimony	004, 012	µg/L	55.4 ⁸
	004	lbs/day	0.4
	012	lbs/day	0.1
Arsenic	001, 002-003, 004, 005-006, 007, 008, 009, 013, 014, 015	µg/L	83 ³
	001	lbs/day	0.8
	002-003	lbs/day	0.08
	004	lbs/day	0.6
	005-006	lbs/day	0.04
	007	lbs/day	0.05
	008	lbs/day	0.02
	009	lbs/day	0.05
013	lbs/day	2.5	

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Parameter	Discharge Points	Units	Interim Effluent Limitation ¹
			Maximum Daily
Arsenic	014	lbs/day	0.8
	015	lbs/day	1.7
Beryllium	004, 007, 013	µg/L	14 ³
	004	lbs/day	0.1
	007	lbs/day	0.007
	013	lbs/day	0.4
Cadmium, Total Recoverable	All	µg/L	8 ³
	001	lbs/day	0.08
	002-003	lbs/day	0.008
	004	lbs/day	0.05
	005-006	lbs/day	0.005
	007	lbs/day	0.005
	008	lbs/day	0.001
	009	lbs/day	0.005
	010	lbs/day	0.03
	011	lbs/day	0.005
	012	lbs/day	0.03
	013	lbs/day	0.2
	014	lbs/day	0.08
	015	lbs/day	0.2
	Chromium III, Total Recoverable	002-003, 004, 005-006, 007, 013, 014, 015All	µg/L
002-003		lbs/day	0.9
004		lbs/day	7.3
005-006		lbs/day	0.5
007		lbs/day	0.5
013		lbs/day	26.4
014 ³		lbs/day	10
015 ³	lbs/day	25	
Chromium VI, Total Recoverable	001, 002-003, 004, 005-006, 007, 013, 014, 015	µg/L	878 ³
	001	lbs/day	11
	002-003	lbs/day	1
	004	lbs/day	5.4
	005-006	lbs/day	0.4
	007	lbs/day	0.5
	013	lbs/day	22

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Parameter	Discharge Points	Units	Interim Effluent Limitation ¹
			Maximum Daily
Chromium VI, Total Recoverable	014 ³	lbs/day	11
	015 ³	lbs/day	22
Copper, Total Recoverable	All	µg/L	543 ³
	001	lbs/day	5.7
	002-003	lbs/day	0.5
	004	lbs/day	4
	005-006	lbs/day	0.2
	007	lbs/day	0.3
	008	lbs/day	0.08
	009	lbs/day	0.3
	010	lbs/day	1.6
	011	lbs/day	0.4
	012	lbs/day	1.6
	013	lbs/day	14
	014	lbs/day	6
	015	lbs/day	13
	Cyanide	005-006, 008	µg/L
005-006		lbs/day	0.02
008		lbs/day	0.005
Lead, Total Recoverable	All	µg/L	200 ³
	001	lbs/day	2.3
	002-003	lbs/day	0.2
	004	lbs/day	1.3
	005-006	lbs/day	0.1
	007	lbs/day	0.1
	008	lbs/day	0.03
	009	lbs/day	0.1
	010	lbs/day	0.7
	011	lbs/day	0.2
	012	lbs/day	0.7
	013	lbs/day	5.2
	014	lbs/day	2.3
	015	lbs/day	4.9

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Parameter	Discharge Points	Units	Interim Effluent Limitation ¹
			Maximum Daily
Mercury, Total Recoverable	001, 002-003, 004, 005-006, 007, 009, 010, 011, 012, 013, 014, 015	µg/L	0.68 ³
	001	lbs/day	0.007
	002-003	lbs/day	0.0007
	004	lbs/day	0.005
	005-006	lbs/day	0.0003
	007	lbs/day	0.0004
	009	lbs/day	0.0004
	010	lbs/day	0.003
	011	lbs/day	0.0005
	012	lbs/day	0.002
	013	lbs/day	0.02
	014 ³	lbs/day	0.007
015 ³	lbs/day	0.02	
Nickel, Total Recoverable	002-003, 004, 005-006, 007, 009, 013, 014, 015	µg/L	281 ³
	002-003	lbs/day	0.25
	004	lbs/day	2
	005-006	lbs/day	0.2
	007	lbs/day	0.2
	009	lbs/day	0.2
	013	lbs/day	7.5
	014 ³	lbs/day	3
015 ³	lbs/day	7	
Selenium, Total Recoverable	002-003, 004, 005-006, 007, 011, 012, 013, 014	µg/L	39 ³
	002-003	lbs/day	0.04
	004	lbs/day	0.3
	005-006	lbs/day	0.02
	007	lbs/day	0.02
	011	lbs/day	0.03
	012	lbs/day	0.1
	013	lbs/day	1
014 ³	lbs/day	0.4	

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Parameter	Discharge Points	Units	Interim Effluent Limitation ¹
			Maximum Daily
Silver, Total Recoverable	004, 005-006, 007, 014	µg/L	7 ³
	004	lbs/day	0.04
	005-006	lbs/day	0.004
	007	lbs/day	0.004
	014 ³	lbs/day	0.08
Thallium	005-006, 007, 011, 012, 015	µg/L	10 ³
	005-006	lbs/day	0.02
	007	lbs/day	0.02
	011	lbs/day	0.03
	012	lbs/day	0.1
	015 ³	lbs/day	0.9
Zinc, Total Recoverable	All	µg/L	5100 ³
	001	lbs/day	58
	002 - 003	lbs/day	6.4
	004	lbs/day	35
	005 - 006	lbs/day	3
	007	lbs/day	3
	008	lbs/day	1
	009	lbs/day	3
	010	lbs/day	19
	011	lbs/day	3.2
	012	lbs/day	16
	013	lbs/day	131
	014 ³	lbs/day	54
	015 ³	lbs/day	125
Bis(2-ethylhexyl)phthalate	001, 004, 005-006, 007, 009, 011, 012, 013, 014, 015	µg/L	18 ³
	001	lbs/day	0.2
	004	lbs/day	0.1
	005-006	lbs/day	0.009
	007	lbs/day	0.01
	009	lbs/day	0.01
	011	lbs/day	0.01
	012	lbs/day	0.06
	013	lbs/day	0.5
	014	lbs/day	0.2
015	lbs/day	0.5	

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- 1 The interim effluent limitations for storm water discharges were derived from the Facility's monitoring data collected from Discharge Point 001 through 015 from 2011 to 2017. The maximum daily interim limitations apply for both wet and dry weather storm water discharges where appropriate as per the effluent limitations included in Order R4-2018-XXXX.
- 2 Based on the average of the maximum effluent concentrations detected at each of the Outfalls 001 through 015
- 3 Based on the maximum effluent concentration detected from all outfall discharges.
- 4 Based on the average of all the average monitoring results for each of the discharge outfalls.
- 5 No historical monitoring data is available to calculate an interim limit for E. coli. The limit has been set at 5 times the TMDL based waste load allocation.
- 6 Maximum of data excluding the outlier of 1010 mg/L.
- 7 Maximum of data excluding the outlier of 250 ml/L.
- 8 Maximum of data excluding the outlier of 470 µg/L.

The foregoing interim effluent limitations are in effect from August 1, 2018, through June 30, 2023. During this time, the Discharger shall investigate and implement any required upgrades to control measures to ensure compliance with the final effluent limitations for the pollutants included in Table 1 above and in Order No. R4-2018-XXXX.

2. The Discharger shall comply with the tasks and schedule in Table 4 below to achieve the final effluent limits for pollutants listed in Table 3 above. The compliance schedule is based on the Discharger's estimated time schedule for completion as proposed in the request dated February 27, 2017, March 8, 2017, and January 19, 2018, with modifications from the Regional Board.

The compliance schedule is as follows:

Table 4. Compliance Schedule (After adoption of Permit R4-2018-XXXX)

CAFO/Non-CAFO Improvement Phasing Plan			
Phase	Year	Task Description	Completion Date
CAFO Improvement Phasing Plan			
1	1	Field Utility Potholing and Utility Conflict Identification; 30+ potholes; Updated Basemap.	August 2018
2	2	Non-CAFO Roof Diversion Plan 100% Design; CAFO Basin and Sewer Diversion 100%	August 2019
3	3	Construction of CAFO Basin / Sewer Diversion System Modifications. Relocate two existing waterlines.	August 2020

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CAFO/Non-CAFO Improvement Phasing Plan			
Phase	Year	Task Description	Completion Date
4	3 - 5	East Side Roof Gutter and Roof Drain Improvements 12,300 linear feet (LF) Gutters / 3,750 LF Storm Drain = 3 seasons	May 2023
Phasing and Schedule for Non-CAFO Improvements			
Phase	Year	Task Description	Completion Date
1		Install flow meters on all outfalls (interim and final). Install samplers and equipment, conduct potholing and field investigations to confirm storm drain connections and configurations. Initiate sediment and biofilter media pilot testing during rainy season (2018/2019). Collect composite sampling. Update base map for final design of all storm drain improvements	June 2019
2		Sediment control BMP design for Outfall 001. Sediment filters and biotreatment Low Impact Development (LID) filter design for Outfall 001. Storm drain consolidation design for Outfalls 007/008 and 009/010. Infiltration/ & bypass biotreatment BMP design for Outfalls 002, 004, 008, 010, 013 Utility Relocation Design and supplemental survey. Review of Pilot Testing BMP results and modify proposed BMPs.	December 2020
3		Construction of sediment control BMPs for Outfall 001 Install sediment filters and biotreatment LID filters for Outfall 001 (upstream within existing inlets) Construct storm drain consolidation for Outfalls 007/008 and 009/010 Construct infiltration BMPs and biotreatment	May 2023

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CAFO/Non-CAFO Improvement Phasing Plan			
Phase	Year	Task Description	Completion Date
		BMPs in the following order: Outfalls 013, 010, 008, 004, 001 & 002 Submit 2023 ROWD to LARWQCB demonstrating completion of Non-CAFO improvements	

3. Achieve full compliance with the final effluent limitations for TSS, BOD, ammonia, settleable solids, fecal coliform, E. coli, antimony, arsenic, beryllium, cadmium, chromium III, chromium VI, copper, cyanide, lead, mercury, nickel, selenium, silver, thallium, zinc, and bis(2-ethylhexyl)phthalate, in Order No. R4-2018-XXXX, no later than June 30, 2023.
4. Submit annual progress reports of efforts towards compliance with the final effluent limitations for the pollutants listed in Table 4 above. The reports shall summarize the progress to date, activities conducted during the reporting period, and the activities planned for the upcoming reporting period. Each report shall be submitted to this Regional Water Board by November 1st and include all actions completed per the milestones in this Order and any new pertinent updates. The first annual progress report is due on November 1, 2019.
5. Submit a final report on the results of the evaluation of the selected actions/measures by November 1, 2023. The report shall include: a) results of the study proposed by Discharger; b) a description of the actions/measures selected; c) the monitoring data collected; and d) an evaluation of the effectiveness of the selected actions/ measures.
6. All technical reports required under this TSO are required pursuant to Water Code sections 13267 and 13383. The Regional Water Board needs the required information in order to determine compliance with this TSO. The burdens, including costs, of these reports bear a reasonable relationship to the needs for the reports and the benefits to be obtained from the reports.
7. The Regional Board, under the authority given by Water Code section 13267(b)(1), requires a Discharger to include a perjury statement in all reports submitted under this TSO. The perjury statement shall be signed by a senior authorized representative (not by a consultant). The perjury statement shall be in the following format:

“I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

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8. If the Discharger fails to comply with any provision of this TSO, the Regional Water Board may take any further action authorized by law. The Executive Officer, or his/her delegate, is authorized to take appropriate administrative enforcement action pursuant, but not limited to, Water Code sections 13301, 13350 and/or 13385. The Regional Board may also refer violations to the Attorney General for judicial enforcement, including injunction and civil monetary remedies
9. All other provisions of Order No. R4-2018-XXXX, that do not conflict with this TSO, are in full force and effect.
10. This Time Schedule Order expires on June 30, 2023.

I, Deorah J. Smith, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, Los Angeles Region, on June 14, 2018.

Deborah J. Smith
Executive Officer

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